

May 27 2004

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 03-66

Dear Chairman Powell:

For many years Valencia Community College has used Instructional Television Fixed Service ("ITFS") channels in the 2.5 GHz band to transmit instructional programming to students spread among our various campuses and to distance learning students at home and at their workplace. Furthermore, we broadcast, via ITFS and cable, programs of interest and importance to the Orlando community at large. The advent of new technologies and the prospect of band plan and rule changes requested by the ITFS community promise new digital educational services that will enhance our service to students and the community.

We understand that a proposal from the Wireless Bureau is being circulated for rushed FCC consideration that would eliminate the eligibility restrictions on ITFS spectrum, and would reduce the amount of spectrum held by each ITFS licensee in order to accommodate new commercial users in the band. This proposal is seriously flawed.

ITFS is the only spectrum specifically allocated to support formal education. This vital educational asset must be protected, as the FCC promised to do just three years ago. As the FCC updates the technical rules for ITFS to more effectively support a range of new broadband services, **we urge you to reject misguided proposals to allow any ITFS spectrum to be licensed to commercial entities, or to reduce in any respect the total amount of spectrum allocated to ITFS.** If necessary, you must delay consideration of the proposal to a later meeting, so that our concerns can be heard.

The possibilities for future development of educational services in the ITFS band are exciting, and we plan to use the spectrum fully as soon as its continued use is assured. I hope that you will support our efforts to keep this valuable educational resource. Thank you for your consideration of this important matter.

Sincerely,

Sanford C. Shugart

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein